



European
Commission

Greening of the Creative Europe Programme

Creative Europe greening monitoring guide

*Creative
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E-mail: EAC-CREATIVE-EUROPE-GREENING-STUDY@ec.europa.eu

*European Commission
B-1049 Brussels*

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Edited by: Toms Feifs

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List of acronyms

CCS	Cultural and creative sectors
CO2	Carbon dioxide
DG CNECT	Directorate-General for Communications Networks, Content and Technology
DG EAC	Directorate-General for Education, Youth, Sport and Culture
EACEA	European Education and Culture Executive Agency
GHG	Greenhouse gas (emissions)
KPIs	Key performance indicators

List of definitions

‘Greening’ in the context of this study refers to 1) supported projects voluntarily pursuing green objectives of promoting sustainability and fight against climate change either as their primary focus or alongside other objectives such as cultural or artistic creation, innovation, social inclusion etc. and 2) projects supported by the Creative Europe Programme making decisions and implementing corresponding activities to reduce their environmental impact, including the impact of the supported project activities on climate change.

‘External greening’ in the context of this study refers to supported projects pursuing green objectives of promoting sustainability and fight against climate change either as their primary focus or alongside other objectives such as cultural or artistic creation, innovation, social inclusion etc.

‘Internal greening’ in the context of this study refers to projects supported by the Creative Europe Programme making decisions and implementing corresponding management and project activities¹ to reduce their environmental impact, including the impact of the supported project activities on climate change.

‘Green project’ in the context of this study is used to denote a project supported by Creative Europe that pursues or pursued ‘green objectives’ of promoting sustainability and fighting against climate change either as their primary objective or alongside other objectives.

‘Green requirements’ in the context of this study refers to requirements included in calls for proposals that applicants need to address at application stage or during project implementation, monitoring and reporting stages to progressively align supported projects with the European Green Deal objectives.

‘Green mobility’ in the context of this study is used to refer to modes of transport that seek to reduce their environmental impact and impact on climate change. Mobility can be considered green or greener when walking or using transportation modes including bicycles, electric bicycles or scooters², public transport³, electric cars⁴, hydrogen cars⁵, carpooling or car-sharing of low-emissions cars, etc.

‘Sustainability’ in the context of this study refers to the sectors seeking to adopt more environmentally sustainable practices and, by this, to minimise their environmental and climate change impacts to meet the European Green Deal objectives and international commitments on tackling climate change⁶ as well as concerns and needs of their audiences, seeking to prevent the depletion of natural or physical resources, and moving towards carbon neutral operations in the future.

¹ Activities include establishing effective green governance structures, reducing and minimising travel and transportation, reduce energy usage and use renewable sources, recycle and reuse materials etc.

² It is also important how the electricity that is used to power electric bicycles or scooters is produced. The share of green energy achieved will depend on the Member State.

³ including buses, trains, tams, trolleybuses, etc.

⁴ The efficiency of electric cars differs considerably. It is also important how the electricity that is used to power electric cars is produced. The share of green energy achieved will depend on the Member State.

⁵ The way hydrogen is produced is important. ‘Green hydrogen’ produced through electrolysis (splitting water into hydrogen and oxygen) using renewable energy is currently the only sustainable hydrogen option.

⁶ Pursuing the Union’s commitments to implement the Paris Agreement adopted under the United Nations Framework Convention on Climate Change and the UN Sustainable Development Goals.

Introduction

The Creative Europe Programme of the European Commission (the Commission) has the potential to mainstream environmental climate and biodiversity actions within and beyond the Creative Europe Programme, reduce greenhouse gases (GHG) emissions coming from the cultural and creative sectors (CCS) as well as to contribute towards achieving the short-term budgetary target of 30% of Union budget expenditure supporting the New Green Deal objectives by 2030 as well as the EU's and the Creative Europe Programme's climate neutrality in the longer-term, by 2050⁷.

This Monitoring guide was prepared as one of the final deliverables of the study 'Greening the Creative Europe Programme' (further 'Greening study') delivered by ECORYS for Directorate-General for Education, Youth, Sport and Culture (DG EAC) of the European Commission (the Commission). It should be read alongside the Final report of this study and its two other annexes (the Programme greening strategy and the Environmental good practices guide) that together with this Guide outline the key recommendations of this study.

The recommendations presented in this Monitoring guide are targeted at the Commission managers responsible for the development of Creative Europe monitoring provisions⁸. The recommendations included in this Guide extend the existing monitoring exercises, processes and procedures to include monitoring against a limited number of feasible key performance indicators (KPIs) for measuring Creative Europe Programme's contribution to the European Green Deal. The monitoring methodologies proposed in this guide are built on current Programme's monitoring and administration provisions.

Objectives of the guide

In line with the Technical specifications for the Greening the Creative Europe Programme study, this guide includes a proposal for 'green indicators' that could be used to measure the Creative Europe successor programmes' progress and contribution towards the European Green Deal objectives during a period after 2027. Where relevant and possible at this stage, it is also used to define indicative targets and baselines for measuring, monitoring and evaluating successor programme's progress towards these objectives.

The recommendations included in this guide have been developed based on the consultations with the programme stakeholders delivered in the context of the 2022 study on Greening the Creative Europe Programme, including a Validation workshop.⁹ The specifications of this study stipulate that the recommendations included in this monitoring guide should apply for period after the current Creative Europe Programme (2021-2027). However, a number of recommendations proposed to some extent may be feasible and tested already during the current (2021-2027) programme period.

The guide presents a number of considerations that were stipulated by the requirements of the Technical specifications as well as by the DG EAC client and have framed the recommendations for monitoring programme greening included in this guide. Where relevant, this guide builds on the methodologies proposed in the Programme greening strategy for the identification and tagging of programme supported activities that contribute to the Green Deal objectives, which constitute the basis for the approaches recommended for estimating the Programme's contribution to climate objectives.

⁷ These methodologies and KPIs proposed by this guide have been designed to take into consideration these short term and longer-term ambitions in terms of focusing on measuring Programme contribution to the European Green Deal objectives in the short term and aligning the Programme with zero emissions target in the longer term.

⁸ Pursuant to Article 20 of the Regulation (EU) 2021/818 establishing the Creative Europe Programme (2021 to 2027).

⁹ This study and its recommendations are not the opinion of the Commission; therefore, study recommendations are not binding. This study only aimed to support with the ongoing efforts of Creative Europe Programme to contribute to the Green Deal objectives.

Finally, the guide puts forward recommendations for the main principles that should be considered in definition of green eligible costs under the successor Creative Europe programme, types of costs that could be supported as well as methods to quantify and report on this green expenditure.

Underlying considerations

This guide follows the underlying considerations detailed in the Programme greening strategy that recommends a gradual and organic 'greening' of the Creative Europe programme. Hence, this guide recommends a pragmatic transition towards more sustainable programme that is inclusive of all its main stakeholders, a transition that takes into account the main challenges and opportunities of greening the programme and its three main strands that is driven by grassroots initiatives of its beneficiaries and coordinated towards the Green Deal targets and objectives by programme managers.

The recommendations presented in this guide are in line with the requirements of the Technical specifications to ensure that any proposals made are in line with the Programme objectives¹⁰, respect the creative, editorial and artistic freedoms of programme beneficiaries, and seek to minimise market distortions due to the intervention. The recommendations are built on the current monitoring roles, practices and rules of the Creative Europe Programme, hence seeking to minimise the administrative burden of 'green' monitoring and reporting for programme beneficiaries and programme managers alike¹¹.

Proposed monitoring approach

In line with the recommendations presented in the Programme greening strategy, monitoring of programme greening could be organised towards a number of successive programme's greening stages that first take stock, recognise and disseminate green practices already delivered by supported projects¹², monitor developments, follow debates and innovative green practices, and anchor what is relevant from these practices within the programme through testing and progressively more demanding greening requirements¹³, and then go on to standardise and formalise effective greening practices to achieve a climate neutral programme by 2050¹⁴.

The bulk of recommendations presented in this Programme Greening guide are focused on the first stages of this successive programme greening process, corresponding to the scope of this exercise as defined by the Technical specifications for the Greening study¹⁵. Considering the present geopolitical situation, the pace of development of digital and green technologies over the last decades as well as the European Parliament elections and the change of Commission in 2024, this approach would need to be complemented by future research exercises to:

- Ensure that the monitoring approach for Creative Europe programme greening remains aligned with the Commission's and Member States' political priorities (as well as the wider EU climate and environmental commitments);

¹⁰ As laid down in Article 3 of the Regulation (EU) 2021/818 establishing the Creative Europe Programme (2021 to 2027)

¹¹ The recommended practices are also in line with the good practices of past and current Programme beneficiaries as identified by the Greening study.

¹² Please see the ECORYS Greening study on the extent and nature of the current Programme greening.

¹³ In line with the findings and conclusions of the Greening study this work should focus on singling out the horizontal greening priority and what supported projects plan to do voluntarily to improve the sustainability of their practices during project assessment.

¹⁴ The four project greening stages outlined in the Programme greening strategy do not necessarily need to correspond the four (or five, if counting the current) Creative Europe successor programme periods up to 2050, as it could be envisaged that projects and sub-sectors supported by Creative Europe, its schemes and actions as well as programme strands undergo the four stages of greening at different and overlapping paces. Moving back and forward between programme greening stages could also be envisaged when particular greening requirements are tested, implemented, but then need to be revised and re-tested again as they fully did not meet the expectations of programme stakeholders.

¹⁵ I.e., to produce recommendations for monitoring the greening of the potential Creative Europe successor programme to be delivered after the end of the current programme period (2021-2027).

- Progressively, systematically and incrementally step up the greening requirements in line with bottom-up developments in the CCS as well as the respective aims of the programme greening stages outlined in the Greening strategy¹⁶;
- In short-term¹⁷, develop¹⁸, pilot and test the proposed KPIs (please see below) and factor in particular milestones on the way to the 2050 climate neutrality target e.g. the EU budgetary target for expenditure supporting climate objectives¹⁹;
- In longer-term, gradually change the focus of the greening KPIs, linked to the programme greening requirements, from descriptive to prescriptive to mandatory across the five programme periods²⁰ to be delivered by 2050;
- Ensure that green reporting requirements are adapted and changed with evolving greening culture in CCS, data availability on sustainability of projects supported by the programme as well as 'standardisation' of green monitoring methods and tools used by programme beneficiaries due to market forces²¹, technological change and the evolution of knowledge.

Proposed greening KPIs

The proposed KPIs, monitoring goals, data sources, data collection methods and monitoring frequency for programme greening are presented in table below²². To facilitate the work of the Programme managers the proposed KPIs have been organised to highlight those to be addressed by supported projects i.e., programme beneficiaries (two KPIs in total), those to be addressed by future studies on greening the programme linked to mid-term and ex-post evaluations (four KPIs in total) and those to be calculated by the programme managers²³ (three KPIs).

The recommended KPIs have been further organised in categories of KPIs recommended for measuring progress towards internal programme greening (via greening of activities delivered by projects supported by the programme), external dimension of greening²⁴ (i.e., voluntary and bottom-up greening of supported project objectives²⁵) and KPIs for measuring programme's contribution to EU climate objectives (for example, towards the achievement of an overall target of 30% of Union budget expenditure supporting climate objectives²⁶).

All the recommended KPIs are feasible for the programme stakeholders or will be feasible at later, possible iterations of Creative Europe programmes. The ambition of the proposed KPIs cover a range from what is already possible for programme stakeholders based on the results of the Greening study to KPIs that will be required for reporting on a climate neutral programme by 2050. In line

¹⁶ There are no programme-wide greening requirements under the current (2021-2027) Creative Europe Programme. The Culture, Media and Cross-sectoral strands include individual greening requirements in their calls – some more specific and stricter than others. In some Media calls¹⁶ applicants are evaluated on their greening strategies with 5 points while for some Culture calls¹⁶ applicants need to propose awareness-raising and capacity building activities without point scoring. There are also differences in how 2021/2022 calls for Creative Europe schemes were designed to include greening requirements.

¹⁷ I.e. the remaining five years of the current Creative Europe programme (from 2023 to 2027), putting monitoring practices in place for the period of the first three years of the possible Creative Europe successor programme (2028-2030) leading to 2030 benchmark year that has associated climate targets: https://climate.ec.europa.eu/eu-action/european-green-deal/2030-climate-target-plan_en

¹⁸ In line with the recommendations of this note first and feasible universal requirements (and related monitoring provisions) for greening the Creative Europe programme need to be developed and put in place as soon as possible to build on the current momentum of the greening transition (as highlighted by the Greening study, as well as dictated by the current geopolitical and economic situation of the EU).

¹⁹ In short term, greening KPIs could also be adjusted to account for changing sub-sector and programme priorities, changing focus of the programme on particular stages of CC works and services lifecycle due to technological advances or changing consumption patterns as well as the support for internationalisation of CCS provided (or lacking) by programme participating countries or regions.

²⁰ Current programme period (2021-2027), followed by four other multiannual programme periods (2028-2034, 2035-2042, 2043-2049 and 2050-2057).

²¹ E.g. best carbon calculators on the market as well as the competition for Creative Europe, national and regional funds available to CCS operators.

²² Where relevant and possible the targets and benchmarks for these KPIs are also established in the Final report of the Greening study.

²³ While the Commission will be the overall responsible for reporting on these calculations, it is anticipated that they will be prepared in coordination with the EACEA Media and Culture units.




²⁴ The European Parliament emphasised the importance of this external greening dimension of the Creative Europe programme by emphasising the enormous potential of the cultural and creative sectors in encouraging citizens to act more sustainably (please see Article 38 of the European Parliament resolution of 15 September 2020 on effective measures to 'green' Erasmus+, Creative Europe and the European Solidarity Corps (2019/2195(INI))

²⁵ In line with the approach presented in the Programme greening strategy and the requirements of the Technical specifications for the Greening study, objectives of projects supported by the programme are subject to editorial, creative and artistic freedoms and hence external dimension of greening cannot be incentivised or otherwise influenced. This external dimension of greening can be, however, promoted by promoting voluntary and bottom-up initiatives taken by supported projects to green their respective sectors and audiences.

²⁶ As specified by point 36 in the recital of the Regulation (EU) 2021/818 establishing the Creative Europe Programme (2021 to 2027).

with the Technical specifications for this study, the main focus on the KPIs proposed is on measuring the greening of the potential Creative Europe successor programme to be delivered after 2027.

This period (2028-2034) of the potential successor programme has been highlighted in yellow in the table below. As outlined by the Programme greening strategy, this period will be followed by three more consecutive multi-annual programme periods until 2050 (demarcated as periods 3, 4 and 5 in the table below). It is preceded by the current programme period (2021-2027) that is ongoing²⁷ and has been highlighted in light yellow. Three pictograms have been further used to facilitate an overview of what KPIs are expected to be feasible during the five consecutive multi-annual programme periods:

-  denotes the proposed KPIs for measuring programme greening that could be operationalised, piloted and tested already during the current programme period;
-  marks²⁸ the more ambitious greening KPIs that should be feasible only during later multi-annual Creative Europe successor programme periods; and,
-  is used to highlight the KPIs that should be feasible for programme stakeholders during particular multi-annual programme periods.

It needs to be, however, noted that any planning of what greening KPIs will be possible for Creative Europe stakeholders in the future can only be indicative, as political²⁹, sector and sub-sector priorities may change with technological advances and changing consumer behaviour. For the same reasons it is also possible that climate objectives may be advanced or pursued at different speeds by various sub-sectors targeted by the Creative Europe programme. Hence, the table below can only highlight general trends in anticipated approach to monitoring the greening of future Creative Europe programme iterations.

In line with the 'general considerations' outlined above, it is recommended that monitoring against programme greening KPIs is descriptive at first during the 'taking stock' and 'anchoring' stages of the green programme transition³⁰. Once green practices have been internalised and exchanges of good practices in project greening are producing their desired results in terms of testing and mainstreaming of programme greening practices, greening KPIs should progressively become more prescriptive and eventually mandatory during later programme iterations nearing the 2050 climate neutrality ambition.

²⁷ At the end of the Greening study i.e., end of 2022, the current programme was two years into its seven year multi-annual programme period.

²⁸ In line with an expert's suggestion, we have chosen a pictogram of a leaf to match the idea of growth of the greening ambition over time.

²⁹ While the European green course is set in law, also the Regulation may undergo subsequently changes.

³⁰ As concluded by the Greening study this descriptive approach needs to be delivered against clear, specific and separate (from other horizontal priorities) requirements for projects to report how they intend to address greening as a horizontal priority as well as green their project activities under effectiveness assessment of project applications, interim and final reports.

Data source	Area of measurement	Proposed green KPIs	Monitoring goals	Data collection method	Monitoring frequency	Multi-annual programme periods				
						1	2	3	4	5
Programme beneficiaries	Internal greening	Number and share of supported projects that report having a greening strategy ^{31,32,33,34,35}	Quantifies the number and illustrates the share of supported projects (including the lead coordinator and project partners) that tick having a greening strategy in their applications	Application data	Upon application	✓	✓	✓	✓	✓
Programme beneficiaries	Internal greening	Total and share of supported projects that report that they are carbon neutral ^{36,37}	Quantifies the number and illustrates the share of supported projects that can provide evidence ³⁸ that they are carbon neutral	Project reports ³⁹	Project final reports, annual	✓	✓	✓	✓	✓
Programme managers	Internal greening	Total and share of supported projects that report that they are carbon neutral by programme action, strand as well as programme as a whole	Aggregates the number and illustrates the share of supported projects that can provide evidence that they are carbon neutral for each action supported by the programme as well as for its stands and programme as a whole	Project reports	Annual (based on project reports)	✓	✓	✓	✓	✓
Researchers and evaluators	External greening ⁴⁰	Total number and share of supported projects that promoted fight against climate change, environmental and sustainability objectives	Quantifies the number and illustrates the share of supported projects that carried out at least one activity aimed to promote fight against climate change, environmental and sustainability objectives during a programme period	Beneficiary surveys	Mid-team and ex-post evaluation	✓	✓	✓	✓	✓

³¹ This can be on the level of the supported project or on the level of beneficiary organisation (and its partners, if any).

³² Benchmarks for this indicator are provided by the Final report of the Greening study.

³³ What constitutes a genuine sustainability / greening strategy is outlined in the Environmental good practice guide provided by the Greening study.

³⁴ Greening strategies will need to include data on emissions produced by the supported project activities and ways to calculate these emissions using the available carbon calculators. As one Validation workshop participant noted, Creative Europe Desks will need to be trained in guiding applicants on how to undertake these measurements starting with the next multi-annual programme period. The desks would also need to be trained to recognise a genuine greening strategy based on the criteria listed in the Good environmental practice guide provided by the Greening study.

³⁵ One participant of the Validation workshop suggested that smaller operators benefiting from Creative Europe support would find it more difficult to develop a greening strategy. This comment has been accommodated by the fact that the requirement for these strategies is recommended only to be tested during the current programme period and to be introduced with the next multi-annual programme period.

³⁶ Progressively ambitious targets for this KPI will need to be established under future multi-annual programme periods. While the testing of the feasibility of this KPI can already start under the future iterations of the Creative Europe programme, this KPI is only recommended for the two programme periods preceding 2050.

³⁷ One participant of the validation workshop advised being mindful of the other sources of funding and sponsorship for the supported projects to avoid situations where supported projects receive funds from organisations that are perceived to be major polluters.

³⁸ This evidence would need to consist as a minimum of a genuine greening strategy, including assessment of the main areas of climate and environmental impact as well actions taken to reduce this impact the impacts that cannot be eliminated.

³⁹ Lead project partner would be responsible for reporting this data to the EACEA in their interim and final reports.

⁴⁰ Baselines for all proposed KPIs related to the external dimension of programme greening were established by the Greening study.

Researchers and evaluators	External greening	Number and share of supported projects that promoted climate, environmental and sustainability objectives, by scheme / action and programme strand	Quantifies the number and illustrates the share of supported projects that carried out at least one activity towards climate, environmental and sustainability objectives during a programme period	Beneficiary surveys	Mid-team and ex-post evaluation	✓	✓	✓	✓	✓
Researchers and evaluators	External greening ⁴¹	Sum of EU grants (in EUR) awarded to supported projects that promoted climate, environmental and sustainability objectives by programme strand⁴²	Demonstrates the volume of grants provided to projects that carried out at least one activity towards climate change, environmental and sustainability objectives during a programme period under a particular programme strand	Beneficiary surveys	Mid-team and ex-post evaluation	✓	✓	✓	✓	✓
Researchers and evaluators	External greening ⁴³	Share of budget allocated to supported projects that promoted climate, environmental and sustainability objectives (of the total stand budget)⁴⁴	Illustrates the share of funding allocated to projects that carried out at least one activity towards climate change, environmental and sustainability objectives during a programme period under a particular programme strand	Beneficiary surveys	Mid-team and ex-post evaluation	✓	✓	✓	✓	✓
Programme managers	Budget contribution to climate objectives	Sum of EU grants (in EUR) awarded to supported projects that have been assigned	Quantifies annual and total programme spending on projects that promote green objectives and implement green practices	Programme data	Annual	✓	✓	✓	✓	✓

⁴¹ This indicator provides an indication of programme spending on projects that voluntarily promote green objectives. It does not provide an indication of programme spending on projects that are climate neutral, and hence cannot be used to estimate Programme expenditure supporting the New Green Deal objectives.

⁴² Benchmarks for this indicator are provided by the Final report of the Greening study.

⁴³ This indicator provides an indication of programme spending on projects that voluntarily promote green objectives. It does not provide an indication of programme spending on projects that are climate neutral, and hence cannot be used to estimate Programme expenditure supporting the New Green Deal objectives.

⁴⁴ Benchmarks for this indicator are provided by the Final report of the Greening study.

		particular types of green labels ⁴⁵⁴⁶								
Programme managers	Budget contribution to climate objectives	Total aggregated volume of green eligible costs refunded by type of green direct and indirect eligible cost	Quantifies programme spending on green eligible costs, by type of direct and indirect eligible cost e.g. more sustainable travel, subsistence, materials, goods and services	Programme data	Annual	✓	✓	✓	✓	✓

Source: Ecorys analysis, 2022

⁴⁵ Please see the Programme Greening Strategy for examples of labels recommended. Please note that the purpose of these project labels should be initially to recognise greening efforts implemented under the programme. During later iterations of the programme labels could also be assigned to project that have achieved climate neutrality.

⁴⁶ Following a suggestion received during the Validation workshop, successful applicants should be informed about the green label assigned to their project upon its approval to recognise their progress in this area, but to also raise awareness how these green labels will be used to track and calculate the overall programme contribution to climate objectives to illustrate how their work fits into the larger picture of greening the Creative Europe programme.

The deployment and operationalisation of programme greening KPIs for Creative Europe needs to take into consideration the following dimensions:

- Programme greening is predominantly achieved through greening activities of its supported projects (i.e., the internal dimension of programme greening)⁴⁷. This is the area where greening can be incentivised, rewarded and guided by programme managers. It is also the area that should be the main focus of measurement of programme greening in the future and where programme can have compulsory greening requirements during future programme iterations as these are justified by [European climate law](#) as well as required by the [EU budget targets](#) and [Green Deal objectives](#).
- As [highlighted by the European Parliament](#) and [recognised by the Commission](#)⁴⁸ actions supported by Creative Europe also have the potential to 'contribute to mainstreaming climate actions' among European audiences and more specifically the audiences of projects supported by the programme (i.e., the external dimension of programme greening). Work in this area is subject to editorial, creative and artistic freedoms of programme beneficiaries and hence, not subject to external intervention. However, programme beneficiaries' achievements in this area can and should be recognised and promoted by programme managers.
- A further distinction needs to be made between the 'general' and universally (across the Creative Europe programme) applicable KPIs for programme greening presented in the table above and KPIs that supported projects should develop to measure the outputs, results and impact of their communication activities that promote fight against climate change, environmental and sustainability objectives, should they chose to promote these 'green' objectives in the context of their project supported by the programme.

The programme greening KPIs recommended in this guide already account for the above considerations, placing the burden of monitoring data collection in relation to the internal dimension of programme greening predominantly with Creative Europe supported project beneficiaries, while the responsibility for aggregating data on voluntary and bottom-up activities of supported projects that relate to the external dimension of programme greening is mostly placed in the hands of the programme managers. As concluded by the Greening study, programme beneficiaries that intend to pursue green communication objectives with their supported projects will need to set their own ambitious, relevant and effective KPIs⁴⁹.

As detailed in the table above data to inform the proposed programme greening KPIs will come from a number of sources, most of which are already used by the respective programme stakeholders (e.g. application data, programme monitoring data, project evaluation data, project reports, research and evaluation reports, etc.). Supported projects will need to use CO2 calculators to estimate their emissions to be addressed by their greening strategies. During the initial stages of programme greening, it is recommended that the use of calculators is voluntary⁵⁰.

During the current and the next programming periods programme beneficiaries can test and learn how to use calculators that they judge the best suited for their emissions

⁴⁷ One participant of the Validation workshop for this Guide emphasised the need for the Commission to lead by example in greening its own operations alongside progressively introducing requirements for Creative Europe beneficiaries to green their organisations and supported projects. The Commission would do well to present and promote what it does to take steps towards having a climate neutral Commission during initiatives that promote exchanges and learning on greening among programme beneficiaries.

⁴⁸ Please see point 36 of the recitals of the Regulation establishing the current Creative Europe programme.

⁴⁹ Where and if necessary, involving professional communication monitoring and evaluation specialists.

⁵⁰ Project applicants could use any carbon calculator that they prefer, one that has been designed for their specific sector or subsector (either by market operators or commissioned by programme managers). During the initial phases of programme greening, the main purpose should be to allow supported projects to learn how to use carbon calculators in general before their use becomes mandatory under future iterations of Creative Europe Programme.

monitoring needs. The Commission intends to provide a common European emissions calculator that could be adapted by programme beneficiaries in the future.⁵¹ The framework for this common methodology is to be provided by the Commission Recommendation C/2021/9332 of 16 December 2021 on the use of the Environmental Footprint methods to measure and communicate the life cycle environmental performance of products and organisations.⁵²

In line with the suggestions of the CCS and greening experts who reviewed this guide, the feasibility, ambition and relevance of the KPIs and related monitoring methodologies proposed in this document would need to be continuously and regularly monitored, evaluated and adjusted to ensure that these fully meet the CCS realities and data required to report against the Green Deal targets. It is envisaged that this continuous and regular monitoring will be operationalised through the annual monitoring cycle of the Programme as well as a potential follow up study on this aspect of the programme delivery linked to the ex-post evaluation of the current Creative Europe Programme.

Green Deal contributions

In line with the recommendations included in the Programme greening strategy, it is recommended to identify, categorise and aggregate Programme contributions to the European Green Deal objectives against green project labels⁵³ assigned during grant application evaluation process⁵⁴. In addition, it is proposed to aggregate data on green programme spending on reimbursement of green eligible direct and indirect costs listed below (please also see the corresponding KPI for the green eligible costs in the table above).

It needs to be noted that the Programme Greening strategy recommends using the existing actions of the Creative Europe programme to promote exchanges, mutual learning and sharing of good practices in project greening as well as to support project greening with technical expertise. It is envisaged that these mutual learning and exchanges will build on and complement sharing and learning on greening that already takes place under the current Programme schemes.

It is recommended that mutual learning and good practice exchanges supported under the existing programme schemes have their own pre-defined green KPIs that will be activity specific⁵⁵ rather than span the programme as a whole. These 'greening activity' specific indicators will not be directly contributing to the Green Deal targets, but they can be seen (and counted) as Programme spending on mutual learning and green capacity building among supported projects.

Eligible greening costs

It is recommended that any approach to the definition of green costs eligible for reimbursement under Creative Europe is 'checked' for correspondence with the general

⁵¹ According to the Commission, it will seek to establish a common European emissions calculator, based on a common calculation methodology that will set standards, allow comparability and facilitate cross-border collaboration, including for European co-productions.

⁵² https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=PI_COM%3AC%282021%299332

⁵³ As proposed in the Programme greening strategy, green labels could be allocated to project during the application review process. Initially the labels would serve to recognise programme beneficiaries' voluntary efforts to green their projects. During later iterations of the programme the labels could also be used to single out supported projects (and the corresponding share of programme funding) that are climate neutral.

⁵⁴ And also designed to be fully in line with the programme objectives and principles listed under 'Eligible greening costs' sub-section of this guide.

⁵⁵ These would be focused on outputs of greening exchanges and mutual learning activities i.e., number of exchanges and mutual learning activities organised and number of their participants as well as their learning and capacity building results in terms of take aways and improved knowledge of how to green supported projects and impacts in terms of applying this learning and capacity in designing and delivering greener Creative Europe projects.

Programme objectives and strand priorities⁵⁶ as well as the European principles of subsidiarity⁵⁷ and proportionality⁵⁸.

It is also strongly recommended that, where this is relevant, possible and required⁵⁹, programme beneficiaries have a financial stake in assuming part of the eligible greening costs in order to limit potential abuse of these provisions during future programme iterations as well as to increase their effectiveness and efficiency.

Finally, in order to promote their 'predictability', take into account different implementation contexts⁶⁰ and reduce administrative budget for programme managers and beneficiaries alike, it is recommended that any proposals for the introduction of greening costs that are eligible for reimbursement under the programme are:

- as generally applicable as possible (i.e., applying to all similar types of activities and actions supported by the Creative Europe Programme);
- based on clear, simple and transparent criteria of what constitutes eligible greening costs (strictly following the principles outlined above);
- build on the methodologies that are currently used to cover the travel, subsistence, materials, other goods and services as well as indirect costs eligible for reimbursement^{61,62}; and,
- cascading methodologies⁶³ of what greening costs EU covers that take into account the contributions and investment⁶⁴ of programme participating countries and beneficiaries.

In strong adherence to the above-listed principles, it could be recommended to explore the feasibility of Creative Europe covering the following main types of greening costs:

- More environmentally sustainable and slower travel⁶⁵ – eligible greening costs could cover an 'upgrade' from the 'usual' travel options⁶⁶ to any more sustainable travel options⁶⁷ chosen voluntarily by programme beneficiaries;
- More sustainable subsistence, including stay options⁶⁸ – eligible greening costs could cover *more environmentally sustainable* subsistence options chosen voluntarily by programme beneficiaries instead of the 'usual' options⁶⁹;

⁵⁶ Of the possible successor Creative Europe Programme, or against those of the current (2021-2027) Programme, for any approaches that may be tested or piloted before 2028.

⁵⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=URISERV:ai0017>

⁵⁸ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12006E/PRO/30:EN:HTML>

⁵⁹ I.e., where the reimbursement of certain costs in itself is not the main focus on the action supported (e.g. international travel or reimbursement of European networking, co-production or transnational distribution costs)

⁶⁰ In terms of different situations countries and beneficiaries taking part in the Creative Europe Programme find themselves in with respect to the Green Deal objectives (that could result in particular countries or beneficiaries having 'a green advantage' in accessing programme funds).

⁶¹ As presented in the CREATIVE EUROPE Guide for Applicants, Version 2.0 of 11 February 2020: https://ec.europa.eu/research/participants/data/ref/other_eu_prog/crea/guide/crea-guide-applicants_en.pdf

⁶² Unit costs, if different for green eligible costs, would need to be established through a separate study. Until this research is undertaken, the current unit costs should be used.

⁶³ I.e., cascading in the sense of recognising what activities of projects and actions supported by the Creative Europe Programme are 'green' already, could be 'greened' or cannot be delivered in a sustainable way at this stage (with the current available and affordable technologies).

⁶⁴ Not only the investment in financial terms, but also investment in systematic, genuine and effective considerations of more sustainable options for all supported project activities.

⁶⁵ One participant during the Validation workshop recommended the Commission to consider paying a compensation for slower travel. However, this is contrary to the recommendations of this Guide that places the emphasis on the voluntary nature of the more sustainable travel option to be supported by the Programme.

⁶⁶ That, in line with the Programme guide for applicants need to be 'reasonable', including first class rail travel, cheapest air travel fares and in the two aforementioned are not possible – costs of traveling by car.

⁶⁷ That follow the same principles of 'reasonable' costs provided by the Programme Guide for Applicants.

⁶⁸ Where relevant and possible, this could include more sustainable subsistence and stay options provided by the CCS itself (i.e., by its operators / programme beneficiaries), hence keeping the subsistence costs in the sector or in house.

⁶⁹ Which also need to be 'reasonable' according to the Programme guide for applicants, in line with local prices and directly linked to the project supported. The emphasis here needs to be on more environmentally sustainable, not cheaper or more socially responsible options. For example, if beneficiaries choose to share their meals and / or loggings or use accommodation provided by the hosts (while benefiting from the programme covering their subsistence costs) evidence needs to be provided that these are more environmentally sustainable than the 'usual' subsistence and stay options.

- More sustainable equipment costs – eligible greening costs could cover an ‘upgrade’ to more locally produced, sourced or more fully recyclable equipment from those a supported project would typically procure⁷⁰;
- Other goods and services – in the similar fashion covering the cost of transition to more sustainable options⁷¹ (‘greener’ goods and services) than a supported project would typically procure⁷²;
- More sustainable indirect costs – could be promoted via application feedback, e.g. inviting applicants to consider (i.e., change or upgrade to) more sustainable energy, facilities and / or supply providers⁷³;
- Additional category of indirect costs of procuring services of green consultants during implementation of supported projects (please see the Programme greening strategy);
- Costs linked to participation in green training – i.e., all types of green eligible costs listed above for participation in training leading to green certification of CCS entities or projects supported by Creative Europe⁷⁴; and,
- Costs linked to exchange of good greening practices – i.e., all types of green eligible costs listed above in relation to European exchanges, cross-border sharing and learning on good ‘greening’ practices⁷⁵.

Aside the forward-looking element of the eligible greening costs that could be covered by the possible Creative Europe successor programme, it would also be important to pilot definitions and practices linked to eligible greening costs under the current (2021-2027) Programme to build on the ‘greening’ momentum already presented by the CCS as evidenced by the Greening study⁷⁶. The approaches to promoting greener procurement and spending via eligible greening costs for future projects supported by Creative Europe tested during the current Programme could then be institutionalised under the possible successor Creative Europe programme to start after 2027.

⁷⁰ At the same time examining if procurement of these goods and services is really required by the project and its audiences (or perhaps more sustainable alternatives can be used e.g for information and promotional materials).

⁷¹ For external expert services, project fees, information and promotional material costs, etc.

⁷² It would be important here that beneficiaries demonstrate the selected ‘greener’ goods and services are not only produced and delivered in a more environmentally sustainable way but are also selected using a competitive procedure (or at least against a set of objective criteria). For example, choosing a project auditor in a competitive procedure that has a Sustainability strategy.

⁷³ This aspect would also be covered by the supported beneficiaries’ greening strategies (please see the section on the proposed KPIs). The evaluators of Creative Europe project applications would also need to receive training on more or less sustainable modes of travel, more sustainable procurement of materials and catering, more sustainable energy sources, including their production, maintenance and recycling costs. As a minimum, experts undertaking project application selection should be aware or have a ranking of energy sources in terms of their CO2 emissions and wider environmental impacts.

⁷⁴ This training needs to be designed in a way that it does not favour individual CCS entities or projects over others, but instead is delivered ‘in bulk’ to all programme beneficiaries that are interested in this type of training. The training could be made available only to beneficiaries of Creative Europe.

⁷⁵ Any projects that seek to promote EU added value through international exchanges on more sustainable CCS practices would need to be themselves demonstrating good practices in sustainable project design, delivery, monitoring, evaluation and reporting.

⁷⁶ As well as to allow more precise monitoring and reporting on the Programme spending on climate objectives in short to medium term.

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